

Comment No.	Date	Commenter	Topic	Comment	DRAFT Response
1	10/5/2007	Richard Kurylo	General	<p>To The Powers That Be:</p> <p>I was a San Diego resident for 14 years. In April 2007, I left the city to live in Paris, France for 7 months, after which I will be moving to San Francisco. I've been observing all the amazing urban planning in Paris and keeping a journal which my friends and family read. Here is an excerpt from my entry titled "Just Do It!":</p> <p>"I was most impressed that all of the wastewater in Paris is treated. In San Diego, rainwater runoff goes untreated into the ocean and bays. Every time it rains, all the car fluids, cigarette butts, dog feces, and garbage on the streets and sidewalks flow into the storm drains and directly into the waterways. Beaches close as a result of contamination. It's disgusting and unhealthy.</p> <p>In typical San Diego fashion, the City of San Diego embarked on a campaign called 'Think Blue' to halt water from going down storm drains.</p> <p>I reached my limit when the 'Think Blue' representatives made a 20-minute presentation to the planning group on which I served as a volunteer. Our meetings were normally 3 hours long without such idiocracy. I raised my hand in the middle of the presentation. The poor woman didn't know what was coming.</p> <p>'Excuse me,' I said, 'why are you wasting our time with this presentation? Instead of spending money on stupid advertising The woman responded, 'If the city treated rainwater runoff, the treatment plants would overflow and pollute our waterways 'Boston?!' I barked. 'It rains 40 inches a year in Boston and they get big storms. We live in a desert. We only get 10 inches. She didn't answer. She just continued with her presentation."</p> <p>I concluded with the following:</p> <p>"I suggest that the City of San Diego forget their pointless, wasteful advertising campaigns and adopt the philosophy embodied in the words of the poet, Robert Frost: 'The best of all things are those that are not done.'"</p>	Comment noted
2	10/5/2007	Richard Kurylo	Dumping	(1) Dumping anything down the drains was forbidden. That makes sense	Comment noted
3	10/5/2007	Richard Kurylo	Car washing	(2) One could no longer wash one's car unless it was parked on grass. That's OK, I suppose.	Comment noted. Please note that the residential car washing BMP has been modified to minimize excess runoff from such activities.
4	10/5/2007	Richard Kurylo	Sidewalk washing	<p>(3) Businesses were forbidden from hosing off the sidewalks in front of their businesses. That's a problem. Sidewalks get dirtier and dirtier with each passing day. It rarely rains in San Diego and the city doesn't clean the sidewalks like they do in Paris. What's one to do if a dog defecates in front of one's store? Leave it there for weeks?</p> <p>When it rains, where is the rainwater supposed to go? Should it magically jump onto people's lawns? No. all that oily, poopy, stinky water goes right down the storm drain exactly as it would have had people hosed off their sidewalks. It makes no sense.</p>	The minimum BMPs do not prohibit the use of water to clean sidewalks, only that any wash water and associated pollutants be collected and infiltrated into landscaping or disposed of into the sanitary sewer.
5	9/20/2007	Stewart Payne	General	Currently, the City's streets division has responsibility street cleaning and the cleaning of storm drains. It is my observation (in downtown San Diego) that the quality and quantity of street sweeping and storm drain cleaning is inadequate to minimize or prevent stormwater pollution. If the city's goal is to minimize and/or prevent stormwater pollution, it should consider moving these functions under the jurisdiction of the stormwater pollution and prevention program. Doing so would improve the quality and frequency of cleaning by giving the responsibility to the division/department with a primary interest in minimizing and preventing stormwater pollution.	Comment noted. The Storm Water Pollution Prevention Division is considering recommendations designed to improve organizational efficiencies as part of the City's Business Process Re-engineering efforts.

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6	10/19/2007	BID	1. Deteriorated and uneven streets prevent adequate water reclamation.	<p>A number of city streets are in poor physical condition, allowing water to pool up in areas. This poses an obstacle to power washers, who are required to reclaim all water used to clean streets. If power washers are unable to reclaim previously existing pooled water because of reclamation capacity or physical obstacles, they may be fined by the city.</p> <p>A related problem is that streets do not appear to be graded, prior to resurfacing. Many city streets are peaked as a result. Similarly, water that pools along the sides of the streets, next to or in the gutter, cannot be reclaimed.</p> <p>Deteriorated and uneven street surfaces pose other problems for the city as well. Delivery trucks stopping on peaked streets lean precariously over to one side, endangering pedestrians, motorists and property. Additionally, given the quality of infrastructure, the city may face considerable liability for failure to comply with the Americans with Disabilities Act.</p> <p>Recommendations:</p> <p>A. Review street grading and resurfacing techniques. B. Pursue steps to improve city infrastructure, in particular street surface quality. C. Reexamine fine criteria.</p>	<p>Street Division is aware of the conditions of the streets in the Downtown area, however, due to ongoing construction in the Downtown area and the frequent trenching of streets, resurfacing of these streets continues to be postponed until construction is completed. Street Division patches and repairs streets and sidewalks in the Downtown area as needed and as reported. When a street is resurfaced, the edges near the gutter area are milled and repaved to ensure proper surface drainage. In order to enhance quality of street surfaces and address deferred street maintenance work, Street Division has been receiving significantly higher levels of funding and we expect to receive similar levels of funding in Fiscal Year 2009.</p>
7	10/19/2007	BID	2. Sewers and storm drains are cleaned infrequently.	<p>Sewers and storm drains are visibly clogged, posing health threats and blocking storm water runoff. BID program managers have made requests to obtain information on the city's subterranean infrastructure cleaning schedule, priorities and execution. They have not been provided with reliable information.</p> <p>Recommendations:</p> <p>A. Review sewer and storm drain cleaning schedule and program. B. Establish more frequent cleaning schedule. C. Monitor cleaning program to ensure proper execution.</p>	<p>Based on our existing storm drain inventory and information provided by the BID, Street Division has completed most of the storm drain inspection and cleaning in the Downtown area. We expect to complete inspection and cleaning of the remaining storm drains by the end of December 2007. Street Division inspects and cleans storm drains as needed and as requested.</p>
8	10/19/2007	BID	3. City structure, as it relates to storm water issues, is fragmented, presenting communication and other problems.	<p>As we understand it, the Storm Water Pollution Prevention Division is responsible for the education and implementation of the URMP. The Street Division is responsible for filling potholes, street sweeping and maintaining other surface conditions. The Metropolitan Wastewater Department and Water Department are responsible for cleaning the sewer and water systems. And the Transportation and Engineering Division of Engineering and Capital Projects is responsible for resurfacing and repairs to curbs and gutters.</p> <p>Existing coordination problems hamper the storm drain pollution control effort. The fragmentation of the city structure, as it relates to storm water, would be a major obstacle to effective implementation and enforcement of the URMP.</p> <p>Recommendations:</p> <p>A. Review municipal organizational structure, as it relates to storm water. B. Consolidate staff into fewer units.</p>	<p>Comment noted. The Storm Water Pollution Prevention Division is considering recommendations designed to improve organizational efficiencies as part of the City's Business Process Re-engineering efforts.</p>

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9	10/19/2007	BID	4. Builders do not remove obstructions from storm drains upon project completion.	<p>Drain blocking devices used to prevent storm water pollution are left in place indefinitely. This is a serious problem downtown, where new construction has proceeded at a fast pace. Apparently, there is no enforcement.</p> <p>Recommendations:</p> <p>A. Provide developers with a schedule outlining when to come back to the site to remove obstructions from the storm drains.</p> <p>B. Develop a basic enforcement mechanism.</p>	Comments noted and have been referred to the City's Development Services and Engineering and Capital Projects Departments.
10	10/19/2007	BID	5. Reactive reporting process leads to weak and arbitrary enforcement.	<p>Currently enforcement is entirely complaint-driven, effectively requiring the public to serve a role in the enforcement process. This is not an effective enforcement process. The large volume of existing storm water pollutants would require time-consuming and sometimes problematic reporting on the part of power washers, other service providers and members of the public. Significant time lags in enforcement response times are inadequate to deal with a "fluid" situation, such as a serious spill that occurs at night. Furthermore, complaint-driven enforcement provides disincentives to volunteer clean up efforts: Volunteers may be fined.</p> <p>Proactive enforcement would largely resolve these problems. But current staffing levels are inadequate. Currently, the enforcement team comprises only 4 employees for the entire city, all of which respond to complaints. Current funding levels are also inadequate.</p> <p>Recommendations:</p> <p>A. Create a proactive enforcement program.</p> <p>B. Increase staffing levels.</p> <p>C. Increase funding levels.</p>	Comments noted. The Storm Water Pollution Prevention Division is requesting funding for one additional code enforcement officer in the Fiscal Year 2009 budget, and will continue to evaluate the need for additional positions in future years.
11	10/19/2007	BID	Street surface conditions are poor.	<p>There are many causes behind the poor condition of the street surfaces, distinct from the physical conditions. The chief problems are:</p> <ul style="list-style-type: none"> • Trash and recycling trucks regularly drip fluids on to the street. • Trash and dirt pile up in a number of locations, including gutters, storm drains, potholes and gutter wells. • Property owners permit themselves and tenants to contribute to runoff. • Street sweeping is irregular and ineffective. Many downtown street sweeping signs have been removed, leaving motorists unaware that they are prohibited from parking in certain areas during specified time frames. <p>Recommendations:</p> <p>A. Review street sweeping schedule and implementation.</p> <p>B. Increase frequency of street sweeping.</p> <p>C. Enhance effectiveness of street sweeping by replacing signage and enforcing related parking regulations.</p>	Comments noted, and have been distributed to the City's Street Division, and the Environmental Services Department. Street Division currently sweeps the downtown area five times a week at nighttime. Parking Enforcement Officers enforce street sweeping parking regulations on the sweeping nights and report faded or missing street sweeping signs for repair or replacement. Street Division also replaces damaged or missing signs reported by citizens.
12	10/19/2007	BID	Fine revenue may not support storm water efforts.	<p>Fines are a proven way of providing economic incentives to change behavior.</p> <p>Recommendations:</p> <p>A. Continue the use of fines to enforce storm water violations.</p> <p>B. Earmark all fine revenue to educate the public on storm water issues or to rectify infrastructure conditions through bricks and mortar projects.</p>	Comments noted.